

1 NICHOLAS A. TRUTANICH
United States Attorney
2 District of Nevada
Nevada Bar Number 13644
3 DANIEL D. HOLLINGSWORTH
Assistant United States Attorney
4 Nevada Bar No. 1925
501 Las Vegas Boulevard South, Suite 1100
5 Las Vegas, Nevada 89101
(702) 388-6336
6 Daniel.Hollingsworth@usdoj.gov
Attorneys for the United States
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9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 RAMON DESAGE, aka RAMON ABI-
15 RACHED, aka RAYMOND ANTOINE
ABI-RACHED,

16 Defendant.

2:13-CR-039-JAD-VCF

**Government's Unopposed Motion to
Extend Time to File its Response to the
Motion to Intervene by William
Richardson (ECF No. 349)
(First Request)**

ECF No. 353

17 This Motion to Extend Time is the first request. LR IA 6-1.

18 The United States of America respectfully moves this Court for an Order extending
19 the time for the government to file its Response to the Motion to Intervene by William
20 Richardson (ECF No. 349). The reason is the Motion with the attached exhibits is 181
21 pages. Undersigned counsel has a large case load. The government needs more time to
22 review the document and records to file an appropriate response while still meeting the
23 deadlines for other assigned cases. The government now requests an extension to, and
24 including, October 17, 2019.

25 The government discussed the extension with David Chesnoff, counsel for William
26 Richardson, after the sentencing hearing on September 23, 2019, and he agreed to the
27 extension of time.

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1 Because of the foregoing reasons, the government requests and extension of time to
2 review the filed documents.

3 This Motion is not submitted solely for the purpose of delay or for any other
4 improper purpose.

5 This Court should grant an extension of time to, and including, October 17, 2019.

6 DATED: September 26, 2019.

7 NICHOLAS A. TRUTANICH
8 United States Attorney

9 /s/ Daniel D. Hollingsworth
10 DANIEL D. HOLLINGSWORTH
11 Assistant United States Attorney

12 IT IS SO ORDERED:

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15 HONORABLE JENNIFER A. DORSEY
16 UNITED STATES DISTRICT JUDGE

17 DATED: 10/1/2019
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